

1 WILLIAM H. KIMBALL (Bar No. 242626)  
2 whkimball@whkimball.com  
3 LAW OFFICE OF WILLIAM H. KIMBALL  
4 803 Hearst Avenue  
5 Berkeley, CA 94710  
6 (510) 704-1400 (Tel)  
7 (510) 649-5050 (Fax)

8 Attorney for Defendant Eric Burton Benson

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA  
11 OAKLAND DIVISION

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 vs.

15 ERIC BURTON BENSON,

16 Defendant

Case No.: CR-12-00480 YGR (KAW)

17 **STIPULATION AND ~~[PROPOSED]~~**  
18 **ORDER MODIFYING BAIL**  
19 **CONDITIONS**

1 The parties hereby stipulate and move this Court to enter an order modifying the  
2 defendant Eric Benson's release conditions to allow him to travel to the Lake Tahoe area  
3 in order to visit a family vacation property and to participate in avalanche rescue training,  
4 with prior approval and as directed by Pretrial Services.

5 On August 6, 2012, Mr. Benson was arraigned and pled not guilty to charges of  
6 wire fraud, conspiracy, theft from an employee pension benefit plan, bank fraud, and  
7 money laundering. Mr. Benson was released on an unsecured bond of \$100,000. His  
8 current release conditions limit his travel to the Northern District of California, although  
9 the court has modified his release conditions to him to travel within the United States for  
10 military duties, education, and training programs, with prior approval and as directed by  
11 Pretrial Services.

12 Mr. Benson seeks permission to visit a vacation property in the Lake Tahoe area  
13 owned by his wife's family during the holidays and the coming months. He also hopes to  
14 participate in one or more avalanche "search and rescue" courses held in the Lake Tahoe  
15 area with his rescue dog during the winter ski season. The California Rescue Dog  
16 Association sponsors this training. Mr. Benson has been member of this organization  
17 since approximately 2004.

18 Mr. Benson has fully complied with all release conditions to date. Counsel for the  
19 United States does not object to this request to modify Mr. Benson's release conditions to  
20 permit him to travel to the Lake Tahoe area, with prior approval and as directed by  
21 Pretrial Services. The assigned Pretrial Services officer, Amaryllis Gonzalez, has been  
22 informed of this request.

23 Mr. Benson's next court appearance is set for January 31, 2013, at 2:00 p.m.  
24 before Judge Gonzalez Rogers.

25  
26 Dated:

Respectfully Submitted,

27 LAW OFFICE OF WILLIAM H.  
28 KIMBALL

//s//

WILLIAM H. KIMBALL  
ATTORNEY FOR ERIC BENSON

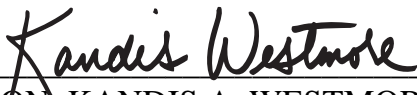
MELINDA L. HAAG  
US ATTORNEY

//s//

KESLIE STEWART  
ASSISTANT US ATTORNEY

GOOD CAUSE HAVING BEEN SHOWN, IT IS SO ORDERED.

Dated: 12/18/12

  
HON. KANDIS A. WESTMORE  
US MAGISTRATE JUDGE